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6/9/2025
CENTRAL DISTRICT OF CALIFORNIA
BY: MMC DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. ASHOT BEJANYAN, aka "Alex Benjamin," Defendant.	No. CR 2:25-CR-00450-CV I N F O R M A T I O N [18 U.S.C. § 1344(2): Bank Fraud; 18 U.S.C. § 1956(h): Conspiracy to Commit Money Laundering]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1344(2)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant ASHOT BEJANYAN, also known as "Alex Benjamin," was a resident of Los Angeles County, California.

2. First Citizens Bank and Trust Co. of North Carolina ("First Citizens") was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

3. The United States Small Business Administration ("SBA") guaranteed certain loans vetted and originated by financial institutions pursuant to the SBA's "Preferred Lender Program" ("PLP"). PLP loans were offered to small businesses or individuals seeking to buy or improve small businesses and who might not be eligible for loans through normal lending channels.

B. THE SCHEME TO DEFRAUD

4. Beginning no later than in or about May 2024, and continuing through at least in or about January 2025, in Los Angeles County, within the Central District of California, and elsewhere, defendant BEJANYAN, knowingly and with intent to defraud, executed a scheme to obtain money, funds, credits, assets, and other property owned by and in the custody and control of First Citizens by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

5. The fraudulent scheme operated, in substance, as follows:

a. Defendant BEJANYAN posed as the owner and operator of Alex Titan Solutions, Inc., an entity that, as defendant BEJANYAN well knew, was merely a shell company that conducted no business activity.

b. Defendant BEJANYAN applied to First Citizens for a PLP loan of $2.6 million on behalf of Alex Titan Solutions, purportedly to fund Alex Titan Solutions' purchase of another shell company purportedly owned by a co-schemer. In that application, defendant BEJANYAN and co-schemers made and caused

to be made materially false statements, and provided and caused to be provided fabricated documents, to First Citizens to cause it to believe that Alex Titan Solutions intended to purchase that other company and to fraudulently induce it to approve the PLP loan for Alex Titan Solutions. Such materially false statements and fabricated documents included fraudulent financial statements, fraudulent federal income tax returns, and false lease documents.

C. EXECUTION OF THE SCHEME

6. On or about January 27, 2025, within the Central District of California and elsewhere, defendant BEJANYAN, together with others known and unknown to the United States Attorney, executed and willfully caused others to execute and attempt to execute the fraudulent scheme through the submission of a document entitled "Business Purchase Agreement and Joint Escrow Instructions" that fraudulently represented that Alex Titan Solutions was purchasing Titan Solutions, Inc. for approximately $3 million, in support of Alex Titan Solutions' PLP loan application to First Citizens.

COUNT TWO

[18 U.S.C. § 1956(h]

7. The United States Attorney realleges paragraphs 1 through 3 and 5 through 6 of this Information here.

A. OBJECT OF THE CONSPIRACY

8. Beginning in or about October 2022, and continuing to at least in or about January 2025, in Los Angeles County, within the Central District of California, and elsewhere, defendant BEJANYAN conspired with others known and unknown to the United States Attorney to knowingly and intentionally conduct monetary transactions in criminally derived property of a value greater than $10,000, knowing that the funds involved represented the proceeds of some form of unlawful activity, and which funds were, in fact, derived from specified unlawful activity, namely, bank fraud, in violation of Title 18, United States Code, Section 1344, in violation of Title 18, United States Code, Section 1957.

B. MEANS AND MANNER OF THE CONSPIRACY

9. The object of the conspiracy was to be carried out, and was carried out, in substance, as follows:

a. Defendant BEJANYAN, and others known and unknown to the United States Attorney, would commit bank fraud, as alleged in paragraphs 5 and 6 of this Information.

b. Defendant BEJANYAN, and coconspirators known and unknown to the United States Attorney, would open bank accounts, including JPMorgan Chase account ending in 1787 ("JPMC 1787"), into which the proceeds of bank fraud would be deposited.

c. Defendant BEJANYAN, and coconspirators known and

unknown to the United States Attorney, would transfer and cause the transfer of proceeds of bank fraud to other bank accounts, or would withdraw or cause the withdrawal of proceeds of bank fraud, for the personal benefit of defendant BEJANYAN and coconspirators known and unknown to the United States Attorney.

C. OVERT ACTS

10. In furtherance of the conspiracy and accomplish its object, defendant BEJANYAN, together with others known and unknown to the United States Attorney, committed and willfully caused others to commit the following overt acts, among others, within the Central District of California, and elsewhere:

Overt Act 1: On October 24, 2022, defendant BEJANYAN caused to be opened JPMC 1787 in the name of a shell entity called Arms of Olympus LLC.

Overt Act 2: On November 22, 2022, defendant BEJANYAN caused to be deposited into JPMC 1787 six checks payable to Arms of Olympus LLC, including checks from shell entities Canmar Promo Corp for $12,480.60; CM General Auto Electric Supplies for $11,420.55; and Mass Exclusive LLC for $12,730.50; and from individuals M.D. for $9,850.40 and V.M. for $9,820.75.

Overt Act 3: On December 15, 2022, defendant BEJANYAN issued check no. 5001 drawn on JPMC 1787 for $12,590.85 payable to shell entity Affordable Essential Business Solutions.

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Overt Act 4: On December 15, 2022, defendant BEJANYAN issued check no. 5006 drawn on JPMC 1787 for $11,470.55 payable to shell entity Dynamic Delivery Install.

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